



CAMERON J. GIBBS  
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November 12, 2024

VIA ECF & ELECTRONIC MAIL

**MEMO ENDORSED**

Hon. Katherine Polk Failla  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007  
Failla\_NYSDChambers@nysd.uscourts.gov

Re: *Dow Jones & Co., Inc. et al. v. Perplexity AI, Inc.*, No. 1:24-cv-07984-KPF,  
Extension of Time to Respond to Complaint

Dear Judge Failla:

We represent Defendant Perplexity AI, Inc. (“Perplexity”), in the above-referenced matter. We write to request a 45-day extension of Perplexity’s deadline to answer, move, or otherwise respond to the Complaint, from Wednesday, November 13, 2024 to Monday, December 30, 2024.<sup>1</sup> Perplexity very recently obtained counsel to represent it in this litigation, and would benefit from additional time to investigate and prepare a response to the Complaint. Plaintiffs have agreed that we may represent to the Court on their behalf that they do not object to this request for a 45-day extension.

There have been no prior requests for such an extension. We appreciate Your Honor’s consideration of this request.

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<sup>1</sup> Forty-five days from the current deadline of November 13, 2024, falls on Saturday, December 28, which would make Monday, December 30, 2024, the new deadline to respond. Fed. R. Civ. P. 6(a)(1).



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Very truly yours,

*/s/ Cameron J. Gibbs*

Cameron J. Gibbs  
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cc: All Counsel of Record (via ECF)

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Application GRANTED. Defendant shall answer, move, or otherwise respond to the Complaint on or before **December 30, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 17.

Dated: November 13, 2024  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE